

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

IN RE:

DOCKET 2004-316-C

Petition of BellSouth
Telecommunications, Inc. to Establish
Generic Docket to Consider Amendments
to Interconnection Agreements Resulting
From Changes of Law

**PETITION TO INTERVENE
OF VERIZON SOUTH, INC.
(OUT OF TME)**

Pursuant to South Carolina Code of Regulations R 103-836A(3), Verizon South Inc. ("Verizon" or "Company") hereby petitions the South Carolina Public Service Commission ("Commission") for permission to intervene in the above-captioned proceeding. In support of its petition, Verizon states as follows:

1. The Company is a corporation and entity existing under the laws of the State of Virginia and has been certified by the Commission to provide, and is currently providing, local exchange, coin, access and intraLATA toll telecommunications services in South Carolina, which are services subject to the jurisdiction of the Commission.

2. For purposes of this proceeding, Verizon's authorized and legal representatives in this matter, to whom all correspondence or communications should be addressed, are:

Mr. Stan Bugner, State Director
VERIZON COMMUNICATIONS INC.
1301 Gervais St. – Suite 825
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3. On or about December 3, 2004, the Commission issued a Notice of Proceeding establishing a generic docket for review and consideration of amendments to interconnection agreements resulting from changes in recent decisions of the Federal Communications Commission ("FCC") and the United States Court of Appeals for the District of Columbia.

4. Because Verizon has entered into interconnection agreements in South Carolina and any decision of the Commission in this docket will likely have a direct impact on the Company, Verizon has a direct and substantial interest in this docket and respectfully requests permission to intervene in this matter as a full party of record.

5. For good cause, Verizon is making this Petition to Intervene Out of Time due to a recent personnel change and inadvertent mistake on its part. There is no reason to believe that the filing of this petition out of time will not be detrimental to the progress or schedule of this docket.

6. Verizon wishes to assist the Commission in the development of a full and fair record, which will assist the Commission competently to resolve the issues in this proceeding. Verizon's position in this matter will be more fully detailed at the hearing and/or after completion of any discovery.

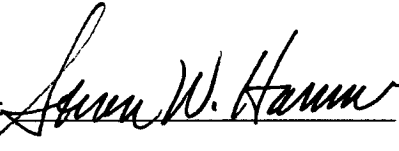
7. Verizon's request to be made a party of record in this docket is in the interest of the public, is consistent with the policies of the Commission for public participation in the matters before it, and is necessary for the development of a full and complete record to address the concerns and views of Verizon.

Accordingly, Verizon respectfully requests that the Commission (1) find that good cause exists for the filing of this petition out of time; (2) grant this request and issue an order permitting Verizon to participate in this proceeding as a full party of record; (3) allow

Verizon to participate fully in the this proceeding and to take such positions as it deems advisable; and (4) grant any other and further relief as is just and proper.

Respectfully submitted this the 22nd day of December, 2004.

VERIZON SOUTH INC.

BY: 

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served, this 22nd day of December, 2004, a copy of the foregoing Petition to Intervene of Verizon South Inc. (Out of Time) in the above-referenced matter by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows, unless otherwise indicated:

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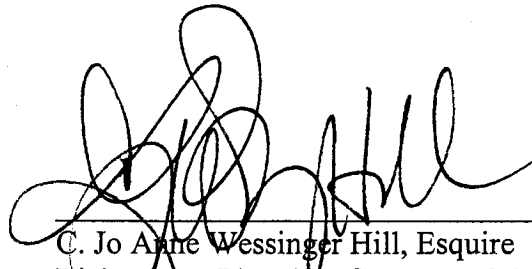
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December 22, 2004

A handwritten signature in black ink, appearing to read "C. Jo Anne Wessinger Hill", written over a horizontal line.

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